

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO.:04 10232WGY

JAMES KEHOE
Plaintiff

V.

MI-JACK PRODUCTS AND
FANTUZZI REGGIANE
Defendants

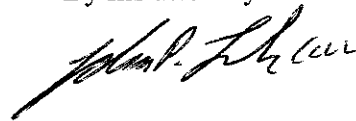
PLAINTIFF'S MOTION TO AMEND COMPLAINT SO AS TO ADD
PARTY DEFENDANT

NOW comes the Plaintiff in the above captioned matter, by his attorney, and hereby move this Honorable Court to allow the Plaintiff to amend his Complaint and add Fantuzzi USA, Inc. as a party Defendant.

As grounds, the Plaintiff states that in the course of Plaintiff's investigation relative to the above captioned matter, it has been learned that Fantuzzi USA, Inc. is a viable and proper Defendant in this action. Accordingly, the Plaintiff wishes to add Fantuzzi USA, Inc. as a party Defendant and do hereby attach their Amended Complaint for filing in this action. The Defendants will not be prejudiced by the amendment of the Plaintiffs' Complaint. A copy of the proposed Amended Complaint is attached hereto as Exhibit A.

WHEREFORE, the Plaintiff moves that this Honorable Court
allow the Plaintiff's Motion to Amend Complaint so as to Add Party
Defendant.

Plaintiff
By his attorney

A handwritten signature in black ink, appearing to read "John P. LeGrand", is written over a horizontal line.

John P. LeGrand
BBO#550185
JOHN P. LEGRAND
& ASSOCIATES, P.C.
375 Broadway, Suite 2
Somerville, MA 02145
(617) 623-3001

CERTIFICATE OF SERVICE

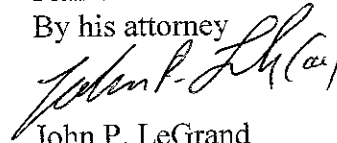
I, John P. LeGrand, Esquire, hereby certify that on April 21, 2004 in compliance with the applicable rules of the Federal Rules of Civil Procedure and Local Rules for the United States District for the District of Massachusetts, I served a true and exact copy of Plaintiff's Motion to Amend Complaint so as to Add Party Defendant and Affidavit Pursuant to Local Rule 37.1 and Local Rule 7.1(A)(2), via First Class Mail, postage pre-paid, to the following individual(s):

Agent or Authorized Representative of:
Fantuzzi USA, Inc.
999 Oakmont Plaza Drive, Suite 380
Westmont, IL 60559

James P. Donohue, Jr. Esquire
SLOANE AND WALSH
Three Center Plaza
Boston, MA 02108

Plaintiff

By his attorney



John P. LeGrand
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